

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ENZOLYTICS, INC.,	:	C.A. No. 1:21-cv-01600-RGA
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
KONA CONCEPTS, INC.	:	
	:	
Defendant.	:	

DECLARATION OF HARRY ZHABILOV

Harry Zhabilov, being duly sworn, deposes and says:

1. I submit this declaration (“Declaration”) in support of the Motion for Summary Judgment of Enzolytics, Inc. (“ENZC”) based on my personal knowledge.
2. I am authorized to make this declaration on behalf of ENZC.
3. I am the Chief Science Officer of ENZC and Chairman of the Board of Directors.
4. I have reviewed ENZC’s records as they pertain to this action. I submit this declaration to authenticate certain records which are kept in the ordinary course of ENZC’s business.
5. As part of the discovery process in this action, ENZC produced the following documents, which have been attached as Exhibit A to the declaration of Antranig Garibian, Esq. (“Garibian Declaration”), which has been bates labeled for ease of referenced as “GARIBDECL A” and is being filed contemporaneously with this declaration as part of ENZC’s motion for summary judgment:
 - a. 12% Convertible Promissory Note of Eco-Petroleum Solutions, Inc. and Immunotech Laboratories, Inc. for the benefit of KONA Concepts Inc. dated March 9, 2017 in the original principal amount of \$25,000.00. (GARIBDECL A – 34-36). This is the

document that gave rise to this action, which Defendant has attempted to enforce against ENZC.

- b. Certificate of Amendment of the Certificate of Incorporation of Enzolytics, Inc. as filed with the Secretary of State of the State of Delaware at 1:20 p.m. on November 17, 2020 (reflecting a change in the name of the corporation from Enzolytics, Inc. to ENZC SUB, Inc.). (GARIBDECL A – 16-17). This document was duly filed with the State of Delaware on the date indicated. ENZC’s maintains documents such as this one in the ordinary course of its business. This document is also publicly available from the state of Delaware, Secretary of State, Division of Corporations.
- c. Certificate of Incorporation of Enzolytics, Inc. as filed with the Secretary of State of the State of Delaware at 1:22 p.m. on November 17, 2020. (GARIBDECL A – 18-19). This document was duly filed with the State of Delaware on the date indicated. This document is also publicly available from the state of Delaware, Secretary of State, Division of Corporations.
- d. Certificate of Incorporation of Enzolytics Merger Corp. as filed with the Secretary of State of the State of Delaware at 1:27 p.m. on November 17, 2020. (GARIBDECL A – 14-15). This document was duly filed with the State of Delaware on the date indicated. This document is also publicly available from the state of Delaware, Secretary of State, Division of Corporations.
- e. Certificate of Merger of Enzolytics, Inc., Enzolytics Merger Corp. and ENZC SUB, Inc. as filed with the Secretary of State of the State of Delaware on November 19, 2020. (GARIBDECL A – 20-21). This document was duly filed with the State of Delaware on the date indicated. This document is also publicly available from the

state of Delaware, Secretary of State, Division of Corporations.

- f. Agreement and Plan of Merger by and among Enzolytics, Inc., ENZC SUB, Inc. and Enzolytics Merger Corp. (GARIBDECL A – 24-29). ENZC’s maintains documents such as this one in the ordinary course of its business.
 - g. Enzolytics, Inc. Supplemental Report – Subsequent Events dated November 23, 2020. (GARIBDECL A – 22-23). ENZC’s maintains documents such as this one in the ordinary course of its business. This document was filed by ENZC at “OTCMarkets.com” where ENZC’s stock was being traded in November 2020.
6. Attached hereto as Exhibit A is a true and correct copy of Certificate of Amendment of Certificate of Incorporation of ENZC Sub, Inc. as filed with the Secretary of State of the State of Delaware on August 27, 2021 (reflecting a change in the name of the corporation from ENZC Sub, Inc. to Robustomed, Inc.). This document was duly filed with the State of Delaware on the date indicated. This document is also publicly available from the state of Delaware, Secretary of State, Division of Corporations.
7. With respect to each of the documents referenced herein, both those which were produced as part of ENZC’s discovery responses, as well as the document attached hereto as Exhibit A, ENZC has produced true and correct copies of the documents.

I declare, certify, verify, and state under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.


Executed on 06/12/2024


Harry Zhabilov

STATE OF

COUNTY OF

On the 12 day of June, 2024, before me, the undersigned, personally appeared Harry Zhabilov personally known to me or proved to me on the basis of satisfactory evidence to be the individual(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their capacity(ies) and that by his/her/their signature(s) on the instrument, the individual(s), or the person upon behalf of which the individual(s) acted, executed the instrument.


Notary Public

